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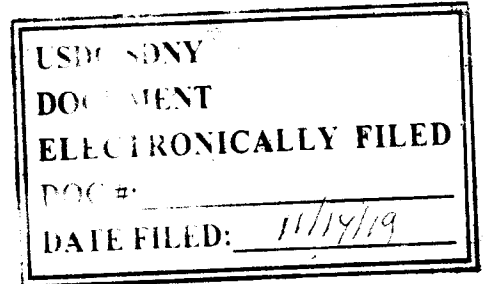
MEMO ENDORSED

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November 14, 2019

via ECF

Hon. Louis L. Stanton
United States District Court for the Southern District of New York
500 Pearl Street
New York, New York 10007



Re: **Dresser-Rand Company v. Petróleos de Venezuela, S.A. and PDVSA Petróleo, S.A.**
S.D.N.Y. Docket No. 1:19-cv-002689-LLS

Dear Judge Stanton:

This firm represents defendants Petróleos de Venezuela, S.A. and PDVSA Petróleo, S.A. (together, "Defendants") in the above-referenced action. We write to respectfully request permission to file under seal portions of Defendants' opposition to Plaintiff's motion for summary judgment, which is due on Monday, November 18, 2019.

In recognition of the sensitive nature of the information that would be exchanged in this action, the Court entered a Protective Order dated September 25, 2019. Dkt. No. 41. The Protective Order requires that all documents "marked or otherwise designated as Confidential or Highly Confidential shall be maintained in strict confidence." Dkt. No. 41 at 5. To the extent that any confidential or highly confidential material is "quoted, attached to, or substantially paraphrased in any pleading, motion, memorandum or other judicial filing in this Action," counsel are required to "make a good faith effort to file such submission under seal." Dkt. No. 41 at 9.

Defendants rely on and plan to submit documents produced by Plaintiff and marked as "confidential," pursuant to the parties' Protective Order, in their opposition to Plaintiff's summary judgment motion. Defendants also substantially paraphrase such documents in their memorandum of law in opposition. Defendants respectfully request permission to file the foregoing documents under seal.

To ensure public access to the portions of Defendants' opposition that do not include or paraphrase confidential information, Defendants plan to file a redacted copy of their opposition via ECF. Defendants will serve an unredacted copy on Plaintiff, and will provide an unredacted courtesy copy to the Court.

For the foregoing reasons, we respectfully request that Your Honor endorse this letter to permit Defendants to file under seal the confidential portions of their forthcoming opposition.

Respectfully submitted,
/s/ Robin L. Muir
Robin L. Muir

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SO ORDERED; but the parties
should be aware that matter which affects
a judicial determination may have to be
publicly disclosed.
LLS

U.S.D.J.
Louis L. Stanton
11/14/19